

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
TARA LYNN HALL	:	
Debtor	:	CASE NO. 1:19-bk-04391
:		
LAKEVIEW LOAN SERVICING, LLC,	:	
or its Successor or Assignee,	:	
Movant	:	
:		
v.	:	
:		
TARA LYNN HALL,	:	
Respondent	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Proof of amounts owed is demanded at trial and this averment is therefore denied. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.
4. Admitted.
5. Proof of amounts owed is demanded at trial and this averment is therefore denied.
6. Admitted.
7. Admitted.
8. Admitted that Debtor missed making a payment because her good friend died and her family has had medical issues; however, the Debtor has the funds to pay and is attempting to make the payment by telephone.
9. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.

10. The Movant is adequately protected by a small amount of equity in the property and by the monthly payments that the Debtor is willing and able to pay.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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